

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECTV, Inc.)	Case No.: 04-12406 WGY
)	
Plaintiff,)	
)	
vs.)	PLAINTIFF'S MOTION TO EXTEND
)	TIME TO MOVE FOR DEFAULT
Paul Saavas)	JUDGMENT OR TO ASSENT TO
)	OPENING OF DEFAULT
Defendant)	

NOW COMES Plaintiff, DIRECTV, Inc., to the above-captioned case respectfully requests that this Court extend the deadlines for the Plaintiff to move for Default Judgment or to assent to the opening of the Default to March 20, 2005.

As grounds, the Plaintiff states:

1. Plaintiff's Counsel has been contacted by counsel for the Defendant, Attorney Todd J. Bennett of Wilmington, MA.
2. Plaintiff's Counsel and Defendant's Counsel are in serious substantive negotiations to either possibly resolve this matter or reach an agreement to request an opening of the Default.
3. Attorney Bennett assents to this motion.

In further support of this motion, see affidavit of John M. McLaughlin

Respectfully Submitted for the Plaintiff,
DIRECTV, Inc.
By Its Attorney

2/18/05
Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
Green, Miles, Lipton & Fitz-Gibbon
77 Pleasant Street
P.O. Box 210
Northampton, MA 01061-0210
(413) 586-0865

CERTIFICATE OF SERVICE

I, John M. McLaughlin, attorney for the Plaintiff, hereby certify that on the 18th day of February 2005, a copy of the foregoing motion and affidavit were sent via electronic mail to

Attorney Todd Bennett
toddbennett@hotmail.com

/s/ John M. McLaughlin
John M. McLaughlin

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DIRECTV, Inc.

Plaintiff

vs.

Paul Saavas

Defendant

) Case No.: **04-12406 WGY**

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**AFFIDAVIT OF ATTORNEY IN
SUPPORT OF PLAINTIFF'S MOTION
TO EXTEND TIME TO MOVE FOR
DEFAULT JUDGMENT OR TO ASSENT
TO OPENING OF DEFAULT**

Now comes John M. McLaughlin, Attorney for the Plaintiff in the above-entitled action,
and, on oath, states the following:

1. I have been contacted by an attorney for the Defendant, Attorney Todd Bennett,
of Corrigan, Bennett & Belfort, PC, Wilmington, MA.
2. Defendant's Counsel and I are in substantive negotiations to either possibly
resolve this matter or reach an agreement to request an opening of the Default.
3. Defendant's Counsel assents to this motion.
4. I respectfully request until March 20, 2005 to move for Default Judgment or to
assent to the opening of the Default.

Subscribed and sworn to, under the pains and penalties of perjury.

Respectfully Submitted for the Plaintiff,
DIRECTV, INC.
By Its Attorney,

2/18/05

Date

/s/ John M. McLaughlin
John M. McLaughlin (BBO: 556328)
Green Miles Lipton & Fitz-Gibbon
77 Pleasant Street
P.O. Box 210
Northampton, MA 01061
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